

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Case No. 2:23-cv-00379-JRG-RSP

Lead Case

JURY TRIAL DEMANDED

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT CORP.,

Defendants.

Case No. 2:23-cv-00377-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF JASON M. WIETHOLTER IN SUPPORT OF PLAINTIFF
HEADWATER RESEARCH LLC'S OPPOSITION TO DEFENDANTS'
MOTION TO STRIKE AND COMPEL SUPPLEMENTATION OF
HEADWATER'S AMENDED INFRINGEMENT CONTENTIONS**

I, Jason M. Wietholter, declare as follows:

1. I am counsel for Headwater Research LLC (“Headwater”) in the above-captioned action. I provide this declaration in support of Headwater’s Opposition to Defendants’ Motion to Strike and Compel Supplementation of Headwater’s Amended Infringement Contentions. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit A is a true and correct copy of Headwater’s Infringement Contention Chart of Apple Representative Product for U.S. Patent 8,589,541, served on March 19, 2024.

3. Attached as Exhibit B is a true and correct copy of Headwater’s Infringement Contention Chart of Samsung Representative Product for U.S. Patent 8,589,541, served on March 19, 2024.

4. Attached as Exhibit C is a true and correct copy of Headwater’s Infringement Contention Chart of Google Representative Product for U.S. Patent 8,589,541, served on March 19, 2024.

5. Attached as Exhibit D is a true and correct copy of Headwater’s Infringement Contention Chart of Motorola Representative Product for U.S. Patent 8,589,541, served on March 19, 2024.

6. Attached as Exhibit E is a true and correct copy of Headwater’s Infringement Contention Chart of Nokia Representative Product for U.S. Patent 8,589,541, served on March 19, 2024.

7. Attached as Exhibit E is a true and correct copy of Headwater’s Infringement Contention Chart of T-Mobile Representative Product for U.S. Patent 8,589,541, served on March

19, 2024.

8. Attached as Exhibit G is a true and correct copy of Headwater's Infringement Contention Chart for U.S. Patent 8,924,543, served on March 19, 2024.

9. Attached as Exhibit H is a true and correct copy of Headwater's Infringement Contention Chart for U.S. Patent 9,198,042, served on March 19, 2024.

10. Attached as Exhibit I is a true and correct copy of Headwater's Infringement Contention Chart of Apple Representative Product for U.S. Patent 9,215,613, served on March 19, 2024.

11. Attached as Exhibit J is a true and correct copy of Headwater's Infringement Contention Chart of Samsung Representative Product for U.S. Patent 9,215,613, served on March 19, 2024.

12. Attached as Exhibit K is a true and correct copy of Headwater's Infringement Contention Chart of Google Representative Product for U.S. Patent 9,215,613, served on March 19, 2024.

13. Attached as Exhibit L is a true and correct copy of Headwater's Infringement Contention Chart of Motorola Representative Product for U.S. Patent 9,215,613, served on March 19, 2024.

14. Attached as Exhibit M is a true and correct copy of Headwater's Infringement Contention Chart of Nokia Representative Product for U.S. Patent 9,215,613, served on March 19, 2024.

15. Attached as Exhibit N is a true and correct copy of Headwater's Infringement Contention Chart of T-Mobile Representative Product for U.S. Patent 9,215,613, served on March 19, 2024.

16. Attached as Exhibit O is a true and correct copy of T-Mobile's Invalidity Contention Chart for U.S. Patent 8,589,541, served on January 16, 2024.

17. Attached as Exhibit P is a true and correct copy of T-Mobile's Invalidity Contention Chart for U.S. Patent 8,924,543, served on January 16, 2024.

18. Attached as Exhibit Q is a true and correct copy of T-Mobile's Invalidity Contention Chart for U.S. Patent 9,198,042, served on January 16, 2024.

19. Attached as Exhibit R is a true and correct copy of T-Mobile's Invalidity Contention Chart for U.S. Patent 9,215,613, served on January 16, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 21, 2024 at Los Angeles, California.

By: /s/ Jason M. Wietholter
Jason M. Wietholter

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 21st day of August 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jason M. Wietholter

Jason M. Wietholter